

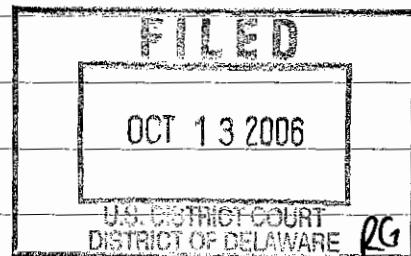
In The United States District Court  
For the District of Delaware

James St. Louis  
plaintiff

Civil Case No.

06-236-SLR

Lt. Cheryl Morris, Del Chus  
Kleen, and Delaware Prison  
(all officers and supervisors  
including State of Delaware)



RG  
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Motion for Leave to File An  
Amended Complaint per Judge Sue  
Roberson Conclusion for  
retaliation claim.

Plaintiff James St. Louis pursuant to  
memorandum order dated September  
22, 2006 refiles motion for  
cognizable retaliation claim.

1. Plaintiff on his Amended Complaint  
named Lt Morris, Del Chus Kleen and  
Delaware Prison (all officers and supervisors  
including State of Delaware).

2. As per memorandum plaintiff  
wishes to drop, as per number 6 orders,  
"all officers and supervisors of the prisons  
systems in the State of Delaware"

3. Plaintiff wishes to keep Lt Morris

the main person involved in plaintiffs retaliation claim. Plaintiff also wishes to include Director Chris Klein, administrator Michael Knight, Lt LeGates, Lt Lehman, Sq Johnson, Sq Boring for their participation of inactivity to protect plaintiffs due process rights and his guaranteed protection under the 8<sup>th</sup> Amendment. ~~and anyone else~~ the court deems appropriate

4 Plaintiff includes a exhibit A the facts and involvement of the Relikes personal and their actions and inactions, in not only Constitutional violations of due process by also for failure to follow procedural rules set up by their own Administration to protect inmates rights.

5. Plaintiff asks this court for each to be held in their individual capacity as well as official capacity.

6. Plaintiff is asking for an injunction to force these officers and participants to follow their own procedures to protect future violations of inmates

7. Plaintiff also ask this court to protect the names of inmates provided to this court to be protect from retaliation from officers named.

8. Plaintiff also ask for compensatory damages as well as punitive damages and as prior filing "front money" or "front pay"

Respectfully submitted

James St Louis Jr.

SBI 446518

1181 Paddock Rd.

Smyrna Delaware

Certificate of Service

I hereby certify that I James St. Louis have filed through Delaware Correctional Center mail motion to file complaint per Judge Sue Rabenow, a retalcation claim two copies of the same document, because of state employees to the following participant.

Deputy Attorney General

Department of Justice

820 N. French Street

Wilmington, De 19801

Del Bar Id No. 3759

Exhibit A pg #1

facts:

The basic problem started 3/8/05 with a meeting with Lt. Morris & Lt. Legales also St. Louis had complained to Lt. Legales about Constitutional issues and threats and extortion being done by 1st cook Govan on the 3rd cooks under "his" supervision.

At the meeting we were told that Govan has the kitchen no matter what and some of the cooks needed to be threatened per Lt Morris.

1st Cook Govan was present. On 3/19/05 another meeting about threats and firing inmates by 1st Cook was held and Lt Morris said everyone had to follow procedures before anyone could be fired. 1st we had to give notice of infraction so there would be a counseling report done to show history of problems and then on the second complaint they could be fired. She also asked us, at that time, who we wanted to be fired out of the kitchen and talked about how to achieve this. She informed us she would talk to "her" officers and have them comply to our wishes.

Govan and St. Louis had seniority in the kitchen and where the heads of Morris team. Since then, interviews for promotions were done with Govan and his second cooks

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with Govan offering questions and promotions  
to inmates who paid him with commissary  
Those who paid got the questions those who  
didn't, didn't get promotion.

St Louis refused to participate in these  
practices and told Lt Morris so. 2 weeks  
before St Louis was fired Govan threatened  
him personally and St Louis went to  
Zone One office Johnson and after talking  
to witnesses reprimanded verbally Govan  
who proceeded to Lt Morris and had  
St Louis called into her office. Govan  
asked no demanded to have St Louis  
fired. and Lt Morris said this couldn't  
be done because of no prior problem or  
desuplary actions. St Louis left meeting  
and Govan and Morris talked for about  
1 more hour. Govan returned letting  
St Louis his time was limited. St  
Louis has brought these violations to  
authorities in charge per procedures and  
was told by Lt Morris if anyone ever  
goes over her head to her bosses would  
feel her wrath. 2 week later on  
12/1/05 St. Louis got accused by  
Boeing of lying and Morris ordered her  
per Lt Bradley to write St Louis up  
on 12/8/05 Lt Morris held a  
fact finding meeting and called

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St. Louis out of his building to be interviewed. It was St. Louis' day off and knew nothing about disciplinary works exp yet. He entered Lt. Lehman's office and was questioned by Lt. Morris about the lying issue from Mr. Bourg. Still no information that there was a warrant up on St. Louis. On leaving St. Louis returned to his building. The next day St. Louis returned to work and Lt. Morris was off along with 1st Cook Govan. St. Louis did his work as usually done and was approached by the other 2nd Cook who asked why I was there. He said 1st Cook Govan said I was fired and he was in charge. St. Louis proceeded to Lt. Lehman CIO in charge and addressed the issue seeing he was involved at his fact finding meeting. St. Louis asked Lt. Lehman if he was terminated or had a disciplinary report and he said no to go back to work. He said he would contact Lt. Morris. About 45 minute later St. Louis was called into Lt. Lehman office and was told Lt. Morris had terminated him and that a disciplinary report would be forth coming. I asked Lt. Lehman

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what about a disciplinary hearing  
and he said this was Lt Morris  
and didn't want to be involved.

He also said as a friend he would  
appeal the action if he were me.

As I was getting ready to leave Lt  
Lehman presented me with a  
disciplinary report dating 48 hours  
prior to termination that Lt Morris  
ordered to be written up, investigated  
by Lt Morris without due process for  
Lt. Louis and terminated by

Lt. Morris. Lt. Louis wrote letters  
to Warden - deputy Warden - Klein -  
Knight - disciplinary hearing officers  
and only Deputy Warden Price answered  
him. And an investigation started with  
no satisfaction to this point. This is  
the end of Lt Morris and the main  
kitchens direct authority in this  
issue.

IM James St. James  
SBI# 446518 UNIT MH 22 A (54)

DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



*Report Mail*

Office of the Clerk

United States District Court  
844 N. King Street, P.O. Box 18  
Wilmington, Delaware

19801-3570

*Report Mail*

ATT: Civil Case No. 06-236-SLR